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June 27, 2014

Hon. Paul G. Gardephe  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2204  
New York, New York 10007  
(212) 805-0224  
Fax: (212) 805-7986

Re: United States v. Thomas Alberto Clarke, Case No. 13-Crim-670-PGC.

Dear Judge Gardephe:

I represent the defendant, Tomas Alberto Clarke, in this case, and I was admitted *pro hac vice* to represent him in this matter in the Southern District of New York on July 9, 2013. I am writing on behalf of Mr. Clarke to request that the Court modify the conditions of his bond release to allow him to move residences within Miami Dade County where he lives. The undersigned has conferred with counsel for the United States about the relief being sought through this application made to the Court, and the United States has no objection to the relief being requested through this application to the Court. Mr. Clark's Pre Trial Services Officer Nora Cruz is likewise aware of this application to the Court and the reasons why Mr. Clarke must change his residence and also has no objection. The specific reasons for the relief being requested are explained below.

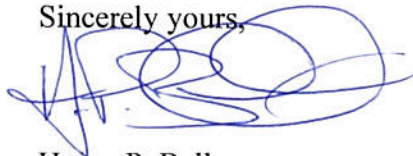
Mr. Clarke was originally charged through a criminal complaint and was arrested in the Southern District of Florida where he lives and has lived for many years. He was released on bond following an agreement between the parties which the Court in the Southern District of Florida granted Mr. Clarke. He then made his initial appearance in the Southern District of New York where he pled guilty to an information filed by the United States. Mr. Clarke was likewise then granted bond release by the Court in the Southern District of New York upon the transfer of the case to Southern District of New York. Pursuant to the conditions of bond release, Mr. Clarke must reside at: [REDACTED] Coral Gables, Florida 33146. Mr. Clarke's lease for this apartment ends June 30, 2014 and he must therefore move to a new residence. This application seeks this Court's permission to modify the conditions of his release so that he may move.

We are asking that the Court modify the conditions of Mr. Clarke's bond release to permit him to move to his parents' home at [REDACTED] Florida 33143 and reside there until July 30, 2014. We are further asking that the Court modify his conditions of bond release to allow Mr. Clarke on August 1, 2014 to move to [REDACTED] Florida 33131 where he will reside pursuant to the conditions of bond release until further order of the Court.

Finally, because this document contains the defendant's home address, which is considered sensitive information under Fed. Crim. P. 49.1, the address set forth in this motion is redacted. The courtesy copy being provided to the Court's Chambers as provided for by the Court's individual practices in criminal cases contains the defendant's un-redacted address so that it may be filed under seal.

Thank you for your attention to this matter.

Sincerely yours,

A handwritten signature in blue ink, appearing to be "Henry P. Bell", with a large, loopy flourish extending to the right.

Henry P. Bell

Copy: AUSA, Jason Cowley  
AUSA, Harry Chernoff  
John Priovolos, Esq.  
Nora Cruz, U.S. Pre Trial Services Officer